

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

BYTEMARK, INC.,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 6:22-cv-00304-ADA
	§	
MASABI LTD.,	§	JURY TRIAL DEMANDED
	§	
Defendant	§	

**DEFENDANT MASABI’S PROPOSED CLAIM CONSTRUCTION  
REGARDING U.S. PATENT NOS. 10,360,567 and 10,346,764**

Pursuant to the Standing Order Governing Patent Proceedings 4.4 and the Court’s Scheduling Order (Dkt.#40), Defendant Masabi Ltd. (“Defendant”) hereby serves its Proposed Claim Construction for the terms to be construed by the Court concerning United States Patent Nos. 10,360,567 (“the ‘567 Patent”), and 10,346,764 (“the ‘764 Patent”) (collectively the “Patents-in-Suit”) on Plaintiff Bytemark, Inc.(“Bytemark”).

By Masabi presenting these proposed definitions, it is not waiving its objections that said terms are indefinite under 35 USC § 112 and thus are invalid. To the extent the Court makes a determination that the following terms are not indefinite and require construction, Masabi proposes the following definitions to aide in the Court’s construction.

**MASABI’S TERMS AND PROPOSED CONSTRUCTIONS**

**The ‘567 Patent**

**TERM**

**“PASS”**

Recited in claims 1, 3, 4, 6-11, 13-16

Proposed Definition of “pass” = computer code generated from a server, that creates a visual display object the customer sees on the phone.

**“ BEHAVIORAL ANOMOLIES / ANOMOLY”**

Recited in claims 2 and 3

Proposed Definition of “behavioral anomalies / anomaly” = server detection of usage of mobile ticketing and passes that do not match up with a consumer's typical usage habits of travel patterns, mismatched data or multiple failed attempts.

**“TIME STAMP”**

Recited in claim 6

Proposed Definition of time stamp = a numerical representation of the date and time of when a file was first created and the date and time of any modifications to the file.

**“PASS DATA”**

Recited in claims 4, 6-8 and 16

Proposed Definition of “pass data” = a numerical data value assigned by the server and utilized by the pass code to generate the visual validation display object.

**“MISMATCH OF A HASH VALUE”**

Recited in claim 5

Proposed Definition of “mismatch of a hash value” = a unique numerical value created by the server that identifies the contents of the file that is stored on the mobile device. A mismatch is when the hash value stored on the mobile device is not identical to the hash value stored on the server.

**“UPDATED USAGE DATA”**

Recited in claim 7

Proposed Definition of “updated usage data” = information regarding the last activation of visual validation of a particular ticket.

**“FRAUDULENT ACTIVITY BIT”**

Recited in claim 15

Proposed Definition of “fraudulent activity bit” = a single binary digit, set by one of two conditional states, indicating the presence or lack of fraud.

Bytemark has not provided sufficient infringement contentions from which their apparent interpretation of the claim terms could be inferred. Therefore, Masabi reserves the right to amend, supplement, and correct the aforementioned definitions as information becomes available.

**BROZYNSKI & DALTON PC**

DATED: March 22, 2024

By: / Katarzyna Brozynski/  
Katarzyna Brozynski  
Bar No. 24036277  
5700 Tennyson Parkway, Suite 300  
Plano, TX 75204  
Tel: 972-371-0679  
Email: [kasia@bdlegallgroup.com](mailto:kasia@bdlegallgroup.com)

Douglas P. LaLone (*Pro Hac Vice Admitted*)  
**FISHERBROYLES, LLP**  
400 Renaissance Center, Suite 2600  
Detroit, MI 48243  
Telephone: 586.871.6302  
E-mail: [Douglas.lalone@fisherbroyles.com](mailto:Douglas.lalone@fisherbroyles.com)

*Attorneys for Defendant  
Masabi Ltd.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on March 22, 2024, to all counsel of record by electronic mail.

By: Douglas LaLone